

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| In re: FIELDWOOD ENERGY LLC, et al., Debtors.¹ | § § § § § § § | Chapter 11 Case No. 20-33948 (MI) (Jointly Administered) |
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**JOINT NOTICE AND REQUEST TO
RESET HEARING AND RENDER DECISION ON STAY MOTION**
(ECF Nos. 1412, 1414, 1415, 1907)

I. Motions to Quash

PLEASE TAKE NOTICE that on May 28, 2021, BP Exploration & Production Inc. (“**BP**”) filed its *Motion of BP Exploration & Production Inc. to Quash Debtors’ Bankruptcy Rule 2004 Discovery Requests* (ECF No. 1415) and Shell Offshore Inc. (“**Shell**”) filed *Shell Offshore Inc.’s Motion to Quash Debtors’ Notice of Bankruptcy Rule 2004 Request for Production of Documents from Shell Offshore Inc.* (ECF No. 1412) (collectively, the “**Motions to Quash**”);

PLEASE TAKE FURTHER NOTICE that on June 11, 2021, the Debtors filed the *Debtors’ Response to Motion of BP Exploration & Production Inc. to Quash Debtors’ Bankruptcy Rule 2004 Discovery Requests* (ECF No. 1539) and the *Debtors’ Response to Motion of Shell Offshore Inc. to Quash Debtors’ Bankruptcy Rule 2004 Discovery Requests* (ECF No. 1540);

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

PLEASE TAKE FURTHER NOTICE that on July 9, 2021, BP filed its *Reply of BP Exploration & Production Inc. in Support of its Motion to Quash Debtors' Bankruptcy Rule 2004 Discovery Requests* (ECF No. 1845);

II. Stay Motion

PLEASE TAKE FURTHER NOTICE that on May 28, 2021, BP filed its *Motion of BP Exploration & Production Inc. for Entry of an Order Pursuant to 11 U.S.C. § 362(d) Authorizing Relief From the Automatic Stay To Arbitration Against the Debtors* (the “**Stay Motion**”) (ECF No. 1414);

PLEASE TAKE FURTHER NOTICE that on July 2, 2021, the Debtors filed the *Debtors' Response to Motion of BP Exploration & Production Inc. for Entry of an Order Pursuant to 11 U.S.C. § 362(d) Authorizing Relief From the Automatic Stay To Arbitration Against the Debtors* (ECF No. 1795);

PLEASE TAKE FURTHER NOTICE that on July 9, 2021, BP filed *BP Exploration & Production Inc.'s Reply in Support of its Motion of for Entry of an Order Pursuant to 11 U.S.C. § 362(d) Authorizing Relief From the Automatic Stay To Arbitration Against the Debtors* (ECF No. 1844);

III. July 9, 2021 Hearing

PLEASE TAKE FURTHER NOTICE that on July 9, 2021, the Court held a hearing (ECF Nos. 1849, 1884) (the “**Hearing**”) to consider the Motions to Quash and the Stay Motion, and heard argument on the Stay Motion but did not hear argument on the Motions to Quash;

PLEASE TAKE FURTHER NOTICE that at the conclusion of the Hearing, the Court ordered the Debtors and BP to file supplemental briefing in connection with the Stay Motion,

see Agreed Preliminary Order ¶ 2 (ECF No. 1907) (“**Agreed Order**”), and, accordingly, on July 16, 2021, the Debtors filed the *Debtors’ Supplemental Brief on “Preliminary Relief in Aid of Arbitration” and Waiver* (ECF No. 1897) and BP filed the *Supplemental Brief of BP Exploration & Production Inc. in Support of Motion for Entry of an Order Pursuant to 11 U.S.C. § 362(d) Authorizing Relief from the Automatic Stay to Commence Arbitration* (ECF No. 1896);

PLEASE TAKE FURTHER NOTICE that since the Hearing, the Debtors, BP, and Shell engaged in commercial discussions (*see* Agreed Order ¶ 1) in good faith;

PLEASE TAKE FURTHER NOTICE that notwithstanding the parties’ discussions, in accordance with Agreed Order ¶ 1, the parties are advising the Court that it is necessary for the Court to rule on the Stay Motion; and

PLEASE TAKE FURTHER NOTICE that, in accordance with Agreed Order ¶ 4, the parties request that the Court set the Motions to Quash for further hearing on August 24, 2021 at 9 a.m. Central Time and render its decision on the Stay Motion.

Dated: August 2, 2021
Houston, Texas

Respectfully submitted,

WEIL GOTSHAL & MANGES LLP

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Certificate of Service

I hereby certify that on August 2, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Paul R. Genender
Paul R. Genender